

Exhibit A

MICHAEL SHAMOS
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANYWHERECOMMERCE, : CIVIL DOCKET
INC., and BBPOS LIMITED :
: PLAINTIFFS : NO.
: 1:19-cv-11457-IT
vs. :
: INGENICO, INC., INGENICO :
CORP., and INGENICO :
GROUP SA :
: DEFENDANTS :

REMOTE DEPOSITION OF
MICHAEL SHAMOS

Taken remotely, via Zoom, on Tuesday, May 17th, 2022, beginning at 10:00 a.m., before Beau Dillard, RPR, a Notary Public in and for the Commonwealth of Pennsylvania, State of New York and Certified Registered Professional Reporter.

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MICHAEL SHAMOS

there's a -- there's -- at least when I read it, I have the impression that there's a reverse engineering being undertaken of the mPOS device.

And maybe that's an incorrect implication or conclusion that I'm reaching. Is that what you're trying to -- is that what you're expressing here?

A. Well, so I don't remember everything in the security analysis. My recollection is in Frisby they were looking at both the devices and the software for the devices.

Q. Okay.

A. Because I remember some -- I recall some mention of potential hardware tax that could be made against the devices which suggests hardware reverse engineering.

Q. Well, you'll agree that the publication says what it says?

A. Oh, absolutely.

Q. Fair enough. Okay. So let's take a look at 82 of your report?

A . Uh - huh .

MICHAEL SHAMOS

Q. So you said here any detection embodied in any BBPOS circuits could be readily ascertained by reverse engineering.

Do you see that?

A. Yes. You open the box and you look at the circuit.

Q. Okay. Is that the basis for your opinion?

A. Yes.

Q. Okay is there any other information that you -- or data that you looked at that would be also relevant to the conclusion that you reached?

A. Don't need any. If you allege that a circuit is a trade secret and you put your circuit in publically available devices, it's no longer a trade secret, that's why we have patents.

Anybody can open it up look at it and say, oh, I can use that. I'll put that in my device, no prohibition against that unless it's patented.

Q. Does your conclusion in this regard necessarily assume that it's in the